

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

<i>In re:</i>	§	
	§	
KrisJenn Ranch, LLC, et al.,	§	CHAPTER 11
	§	
<i>Debtor.</i>	§	CASE No. 20-50805

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KrisJenn Ranch, LLC, et al.,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	
	§	ADVERSARY No. 20-05027
DMA Properties, Inc., et al.,	§	
	§	
<i>Defendants.</i>	§	
	§	

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**AMENDED NOTICE OF ORAL DEPOSITION IN AID OF  
JUDGMENT OF KRISJENN RANCH, LLC**

To: KrisJenn Ranch, LLC, Plaintiff in the above-referenced case and judgment-debtor, by and through its counsel, Charles John Muller, IV, CJ MULLER & ASSOCIATES, PLLC, 111 W. Sunset, San Antonio, TX 78209, john.muller@cjma.law.

Please take notice that Defendants DMA Properties, Inc. and Frank Daniel Moore (collectively, “DMA”), and Longbranch Energy, LP (“Longbranch”) will take the oral and videotaped post-judgment deposition of the corporate representative for KrisJenn Ranch, LLC (“KrisJenn”) best able to testify as to the matters listed in the attached Exhibit A, in aid of the judgment issued against it in this case.

The deposition is scheduled to begin at 9:00 AM on Friday, June 13, 2025. DMA and Longbranch will appear and take the deposition by videoconference (Zoom). The deponent shall remain in attendance until the deposition is completed, unless otherwise

agreed. The deposition will be taken before a court reporter, notary public, or some other officer authorized by law to administer oaths.

You are further ordered and directed to bring and produce at that time and place, as fully as if a subpoena duces tecum were otherwise served upon you, all of the following:

1. A list of all assets belonging to You.
2. Your Tax Identification Number(s), if any.
3. A list of your current addresses, including any business addresses and/or operating addresses.
4. All income tax returns filed by You for the previous four (4) years.
5. All documents referred to in any way, directly or indirectly, in any and all income tax returns filed by you for the previous four (4) years.
6. Any and all documents evidencing Your relationship to Express H2O Pipeline and ROW, LLC ("Express H2O").
7. Any and all documents evidencing the sale, lease, transfer, or other disposition by You of any interest in the right-of-way called the Express Pipeline, which runs from Angelina County through Nacogdoches and Rusk Counties and across Shelby County in East Texas (the "ROW").
8. Any and all documents evidencing the whereabouts of any proceeds from the sale, lease, transfer, or other disposition by You of any interest in the ROW.
9. Any and all documents evidencing the wind up, dissolution, conclusion of legal affairs, or cessation of KrisJenn, if applicable.
10. Any and all documents evidencing the disposition of any assets, property, real property, options to purchase, contracts, accounts, and/or other interests You had in the past four (4) years.
11. All documents that constitute or refer in any way, directly or indirectly, to any and all books, records, or other memoranda of business or financial conduct, activities, status or income of Yours for the past four (4) years.
12. All documents that constitute or refer in any way, directly or indirectly, to any and all deeds, records, or other documents which relate to assets in Your name.
13. All documents that constitute or refer in any way, directly or indirectly, to any records of salaries, commissions, bonuses, income from employment, allowances, expenses, or any other sums of money paid to You or by You within the previous four (4) years.

14. All documents that contain or refer in any way, directly or indirectly, to the name(s) and address(es) of the person or persons who have custody of records of salaries, commissions, bonuses, allowances, expenses, or any other sums of money paid to or by You within the last four (4) years.
15. All documents referring in any way, directly or indirectly, to any items of personal property in which You own or claim any interest.
16. All documents, items, and things referring in any way, directly or indirectly, to any and all accounts (business or personal bank, checking, savings, credit union, or retirement accounts) in which You have an interest.
17. All documents referring in any way, directly or indirectly, to the name and address of persons or entities to whom You have given a financial statement in the last two (2) years.
18. All documents that constitute or refer in any way, directly or indirectly, to financial statements prepared by You in the last four (4) years.
19. All documents containing or referring in any way, directly or indirectly, to the names or addresses of person who have served as Your bookkeepers or financial advisers during the last four (4) years.
20. All documents referring in any way, directly or indirectly, to each person or entity to whom You have paid, given, or conveyed any real or personal property of a value more than \$200.00 in the last four (4) years, not in the regular course of business.
21. All documents referring in any way, directly or indirectly, to any personal or real property which You have sold, given, paid, or otherwise conveyed during the last four (4) years.
22. All documents referring in any way, directly or indirectly, to any and all motorized vehicles (including automobiles, trucks, watercraft, aircraft, and motorcycles) in which You claim an interest.
23. All documents referring in any way, directly or indirectly, to any and all persons or entities who have appraised any real or personal property for You during the last two (2) years.
24. All documents that constitute or refer in any way, directly or indirectly, to any appraisal of any real or personal property prepared for You during the last two (2) years.
25. All documents that evidence or refer in any way, directly or indirectly, to the amount of money owed to You by any person or entity.
26. All documents referring in any way, directly or indirectly, to any legal cause of action, either real or anticipated, by or against You. 19. All documents referring in any way, directly or indirectly, to the anticipated amount of

recovery in any legal cause of action, either real or anticipated, by You.

27. All documents referring in any way, directly or indirectly, to each person or entity who has served as Your bank during the last two (2) years.
28. All documents referring in any way, directly or indirectly, to any cash on hand for You as of the date of the deposition.
29. All documents referring in any way, directly or indirectly, to any and all cash in any account owned or claimed by You held or deposited with any bank or other financial institution(s).
30. All documents referring in any way, directly or indirectly, to any accounts payable owed by You.
31. All documents that constitute or refer in any way, directly or indirectly, to any accounts receivable owed to You.
32. All documents that constitute or refer in any way, directly or indirectly, to notes receivable held by You or in which You claim an interest.
33. All documents referring in any way, directly or indirectly, to shares of stock owned by You or in which You claim an interest.
34. All documents referring in any way, directly or indirectly, to bonds owned by the You or in which You claim an interest.
35. All documents referring in any way, directly or indirectly, to any and all businesses in which You are a partner, officer, or principal owner.
36. All documents referring in any way, directly or indirectly, to any interest You may have in any businesses, partnerships, corporations, or joint ventures.
37. All documents referring in any way, directly or indirectly, to any equipment that You own or in which You claim an interest.
38. All documents referring in any way, directly or indirectly, to mortgage(s) upon which You are liable.
39. All documents referring in any way, directly or indirectly, to accounts payable by You, including account name(s), original amount, person or entity to whom due, balance owing, payments, maturity and collateral.
40. All documents referring in any way, directly or indirectly, to accounts payable by You or in which You claim an interest.
41. All documents referring in any way, directly or indirectly, to any other unpaid taxes for which You are liable except for those already listed with regard to real estate.
42. All documents referring in any way, directly or indirectly, to any assets held in

trust, in an estate, or in any other name or capacity in which You claim or have an interest.

43. All documents referring in any way, directly or indirectly, to assets, except real estate, that are securing any debt for which You are liable.
44. All documents referring in any way, directly or indirectly, to Your obligations to pay the leases, notes, or other debts of any other person or entity.
45. All documents referring in any way, directly or indirectly, to any unsatisfied judgments against You or for which You are liable.
46. All documents referring in any way, directly or indirectly, to any filing in bankruptcy by You or any assignment by You for the benefit of creditors.
47. All documents referring in any way, directly or indirectly, to any dividends payable to You or in which You claim an interest.
48. All documents referring in any way, directly or indirectly, to any interest payable to You or in which You claim an interest.
49. All documents referring in any way, directly or indirectly, to any royalties payable to You or in which You claim an interest.
50. All documents referring in any way, directly or indirectly, to any personal or business expense of Yours (management, rent, household, etc.).
51. All documents referring in any way, directly or indirectly, to any insurance payments You may have or any insurance payments due to You.
52. All documents referring in any way, directly or indirectly, to any other assets not already divulged by You pursuant to this document request.
53. All documents referring in any way, directly or indirectly, to any other liabilities not already divulged pursuant to this document request.
54. All documents referring in any way, directly or indirectly, to any outstanding contracts for which You are entitled to receive a commission, and/or upon which You claim a right to receive a commission, whether a partial commission or complete commission.
55. All documents evidencing safety deposit boxes, lock boxes, and storage facilities of any kind to which You have access.
56. All check stubs, cancelled checks and bank statements for the previous two (2) years for accounts in which You claim an interest.
57. All documents evidencing any trusts and the assets contained therein for trusts of which You are a grantor, a beneficiary, or trustee.

Respectfully submitted,

/s/ Christopher S. Johns

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# Exhibit A

**EXHIBIT A**  
**CORPORATE REPRESENTATIVE TOPICS**  
**FOR KRISJENN RANCH, LLC**

*The relevant time period for all topics is January 2020 through the present, unless otherwise specified.*

1. All assets owned by or belonging to KrisJenn Ranch, LLC (“KrisJenn”) at any point in the preceding five years.
2. Any past or present interest by KrisJenn in the right-of-way called the Express Pipeline, which runs from Angelina County through Nacogdoches and Rusk Counties and across Shelby County in East Texas (the “ROW”).
3. Any efforts by KrisJenn to comply with the Final Judgment after remand issued by the Bankruptcy Court on March 26, 2024 (“Final Judgment”).
4. Any efforts by KrisJenn to comply with the Fourth Amended Substantively Consolidated Plan of Reorganization confirmed by the Bankruptcy Court on February 28, 2022 (“Plan”).
5. Any efforts by KrisJenn to develop the ROW.
6. Any and all steps taken to wind up, dissolve, or conclude the affairs of, or end the legal existence of KrisJenn.
7. The sale, lease, transfer, or other disposition by KrisJenn of any interest in the ROW.
8. The whereabouts of any proceeds from the sale, lease, transfer, or other disposition by KrisJenn of any interest in the ROW.
9. The disposition of any assets, property, options to purchase, contracts, and/or other interests KrisJenn owned at any point in the preceding five years.
10. The disposition of any checking account, savings account, trust fund, money market account, pension plan, profit-sharing plan, mutual fund, or other account or fund of money in which KrisJenn has owned or possessed any interest in the preceding five years.



11. Any present assets, property, options to purchase, contracts, and/or other interests KrisJenn currently owns.
12. Any real estate or personal property that any person or entity holds in the name or for the benefit of KrisJenn.
13. The disposition of any real estate or property KrisJenn held or any other entity or person held in the name or for the benefit of KrisJenn in the preceding five years.
14. KrisJenn's income tax returns or other federal financial disclosures required to be filed with the United States Government from the last five years for KrisJenn.
15. Any ownership, interest in or title to any vehicle by KrisJenn.
16. The disposition of any ownership, interest in, or title to any vehicle by KrisJenn in the preceding five years.
17. Any ownership, interest in or title to, or the disposition of any interest in or title to any of the following kinds of property at any point in the preceding five years:
  - a. Stocks, bonds, or other securities.
  - b. Mortgages or liens on real or personal property.
  - c. Promissory notes, drafts, bills of exchange, or other commercial paper.
  - d. Judgments.
  - e. Savings bonds or other government-issued bonds.
  - f. Any interests in oil, gas, or mineral leases.
  - g. Certificates of deposit, letters of credit, money orders, cashier's checks, traveler's checks, bank deposits, or escrow funds.
  - h. Keogh plans, individual retirement accounts, profit-sharing plans, deferred compensation plans, pension plans, prepaid funeral plans, retirement benefits, or other retirement plans.
  - i. Leases, life estates, remainder interests, or other interests in real property.
  - j. Patents, copyrights, trademarks, service marks, franchises, or other such licenses.
18. Any ownership, interest in, or title to any personal property (including but not limited to furniture, tools, appliances, computers, or copiers), and/or the disposition of any such ownership, interest, or title in the preceding five years.
19. Any ownership, interest in, or title to any personal property now pledged as security for a debt, and/or the disposition of any such ownership, interest, or title in the preceding five years.

20. Any account maintained with any bank, savings and loan association, credit union, or postal savings department, and/or the disposition of any such account in the preceding five years.
21. Any money or other debts owed to KrisJenn, and/or the disposition of any such debt in the preceding five years.
22. Any cases in which KrisJenn has ever been a plaintiff or defendant, including bankruptcy actions.
23. The relationship between KrisJenn and Express H2O Pipeline & ROW, LLC (“Express H2O”).
24. The conveyance of the ROW by KrisJenn to Express H2O, including the terms of such conveyance, any formal written documentation of such conveyance, any consideration conveyed by Express H2O to KrisJenn, and any subsequent disposition of such consideration.
25. Larry Wright’s involvement in Express H2O’s acquisition of the ROW from KrisJenn and/or KrisJenn’s conveyance of the ROW to Express H2O’s.
26. KrisJenn’s disclosure of the Reorganization Plan or Final Judgment to Express H2O.
27. KrisJenn’s disclosure of any net-profits interests in the ROW to Express H2O.
28. KrisJenn’s knowledge of the identity of the current owners of the ROW.
29. KrisJenn’s knowledge of the current owners, members, and/or participants in Express H2O.